

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA) Criminal No. 21-cr-10356
)
) Violation:
v.)
) Count One: Conspiracy to Distribute and to
GINO ROMANO,) Possess with Intent to Distribute Cocaine
) (21 U.S.C. § 846)
Defendant)
) Forfeiture Allegation:
) (21 U.S.C. § 853)
)
)

INFORMATION

COUNT ONE

Conspiracy to Distribute and to Possess with Intent to Distribute Cocaine
(21 U.S.C. § 846)

The United States Attorney charges:

In or about February 2020, in Brockton and Taunton, in the District of Massachusetts,
and elsewhere, the defendant,

GINO ROMANO,

conspired with other persons known and unknown to the United States Attorney, to knowingly
and intentionally distribute and possess with intent to distribute a mixture and substance
containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of
Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

DRUG FORFEITURE ALLEGATION
(21 U.S.C. § 853)

The United States Attorney further alleges:

1. Upon conviction of the offense in violation of Title 21, United States Code, Section 846, set forth in Count One of this Information, the defendant,

GINO ROMANO,

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense.

2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 21, United States Code, Section 853, as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Section 853(p),

to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 21, United States Code, Section 853.

NATHANIEL R. MENDELL
ACTING UNITED STATES ATTORNEY



KAITLIN R. O'DONNELL
Assistant United States Attorney

Date: December 13, 2021